

EXHIBIT A

MESCALL & ACOSTA, P.C.
80 Main Street, Suite 360
West Orange, New Jersey 07052
Tel. (973) 669-3339
Fax (973) 669-3331
Attorney ID #: 028561982
Attorneys for Plaintiff

LOUISE E. SCALERA,

Plaintiff,

-vs-

DSW DESIGNER SHOE WAREHOUSE/
 DSW INC., JOHN DOE (1-10) (fictitious
 name representing unknown defendant), and
 ABC CORP. (1-10) (fictitious name
 representing unknown defendant),

Defendants.

SUPERIOR COURT OF NEW JERSEY
 LAW DIVISION: ESSEX COUNTY
 DOCKET NO: ESX-L-

CIVIL ACTION

**COMPLAINT, JURY DEMAND AND
 DESIGNATION OF TRIAL COUNSEL**

Plaintiff LOUISE E. SCALERA currently residing at 81 Sunrise Drive, in the Township of Gilette, County of Morris and State of New Jersey, by way of complaint against defendants herein, states as follows:

COUNT ONE

1. On or about February 18, 2018, the Plaintiff LOUISE E. SCALERA was a lawful invitee at a commercial premises known as DSW DESIGNER SHOE WAREHOUSE/DSW INC., and located at 1515 US Highway 22 West, in the Borough of Watchung, County of Somerset and State of New Jersey, when she was caused to fall due to a dangerous condition on the premises.
2. On the aforesaid date, and at all other times relevant hereto, the Defendants DSW DESIGNER SHOE WAREHOUSE/DSW INC., JOHN DOE (1-10) (fictitious name representing unknown defendant), and ABC CORP. (1-10) (fictitious name representing unknown defendant), owned, operated, controlled, maintained and/or designed the aforesaid premises.
3. The defendants were so negligent as to allow a dangerous condition to exist which created a hazard to persons lawfully on the premises.
4. As a result of the negligence of these defendants, the plaintiff sustained severe and grievous

personal injuries, and has endured and will in the future endure, great pain and suffering.

WHEREFORE, Plaintiff demands judgment against these defendants, jointly, severally and/or individually, for money damages, together with interest and costs of suit.


JAMES C. MESCALL

Dated: March 25, 2019

JURY DEMAND

PLEASE TAKE NOTICE that plaintiff demands trial by jury as to all issues contained in this Complaint.


JAMES C. MESCALL

Dated: March 25, 2019

DESIGNATION OF TRIAL COUNSEL

PLEASE TAKE NOTICE that James C. Mescall, Esq., is hereby designated as trial counsel in the above-captioned matter pursuant to Rule 4:25-4.


JAMES C. MESCALL

Dated: March 25, 2019

RULE 4:5-1 CERTIFICATION



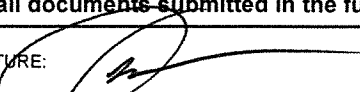
The matter in controversy of this action is not the subject of any other court or arbitration proceeding, nor is any other court or arbitration proceeding contemplated.

I HEREBY CERTIFY that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are wilfully false, I am subject to punishment.

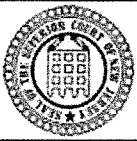

JAMES C. MESCALL

Dated: March 25, 2019

Appendix XII-B1

	CIVIL CASE INFORMATION STATEMENT (CIS)		FOR USE BY CLERK'S OFFICE ONLY	
	Use for initial Law Division Civil Part pleadings (not motions) under <i>Rule 4:5-1</i> Pleading will be rejected for filing, under <i>Rule 1:5-6(c)</i>, if information above the black bar is not completed or attorney's signature is not affixed		PAYMENT TYPE: <input type="checkbox"/> CK <input type="checkbox"/> CG <input type="checkbox"/> CA	
			CHG/CK NO.	
			AMOUNT:	
			OVERPAYMENT:	
		BATCH NUMBER:		
ATTORNEY / PRO SE NAME James C. Mescall, Esq.		TELEPHONE NUMBER (973) 669-3339		COUNTY OF VENUE Essex
FIRM NAME (if applicable) MESCALL & ACOSTA, P.C.			DOCKET NUMBER (when available)	
OFFICE ADDRESS 80 Main Street, Suite 360 West Orange, NJ 07052			DOCUMENT TYPE Complaint	
			JURY DEMAND <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
NAME OF PARTY (e.g., John Doe, Plaintiff) Louise E. Scalera		CAPTION Louise E. Scalera vs. DSW Designer Shoe Warehouse, et al		
CASE TYPE NUMBER (See reverse side for listing) 605	HURRICANE SANDY RELATED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	IS THIS A PROFESSIONAL MALPRACTICE CASE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO IF YOU HAVE CHECKED "YES," SEE N.J.S.A. 2A:53 A -27 AND APPLICABLE CASE LAW REGARDING YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT.		
RELATED CASES PENDING? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF YES, LIST DOCKET NUMBERS		
DO YOU ANTICIPATE ADDING ANY PARTIES (arising out of same transaction or occurrence)? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY (if known) <input type="checkbox"/> NONE <input type="checkbox"/> UNKNOWN		
THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE.				
CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION				
DO PARTIES HAVE A CURRENT, PAST OR RECURRENT RELATIONSHIP? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF YES, IS THAT RELATIONSHIP: <input type="checkbox"/> EMPLOYER/EMPLOYEE <input type="checkbox"/> FRIEND/NEIGHBOR <input type="checkbox"/> OTHER (explain) <input type="checkbox"/> FAMILIAL <input type="checkbox"/> BUSINESS		
DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR PAYMENT OF FEES BY THE LOSING PARTY? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO				
USE THIS SPACE TO ALERT THE COURT TO ANY SPECIAL CASE CHARACTERISTICS THAT MAY WARRANT INDIVIDUAL MANAGEMENT OR ACCELERATED DISPOSITION				
 DO YOU OR YOUR CLIENT NEED ANY DISABILITY ACCOMMODATIONS? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF YES, PLEASE IDENTIFY THE REQUESTED ACCOMMODATION		
WILL AN INTERPRETER BE NEEDED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF YES, FOR WHAT LANGUAGE?		
I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with <i>Rule 1:38-7(b)</i> .				
ATTORNEY SIGNATURE: 				

Side 2



CIVIL CASE INFORMATION STATEMENT (CIS)

Use for initial pleadings (not motions) under *Rule* 4:5-1

CASE TYPES (Choose one and enter number of case type in appropriate space on the reverse side.)

Track I - 150 days' discovery

- 151 NAME CHANGE
- 175 FORFEITURE
- 302 TENANCY
- 399 REAL PROPERTY (other than Tenancy, Contract, Condemnation, Complex Commercial or Construction)
- 502 BOOK ACCOUNT (debt collection matters only)
- 505 OTHER INSURANCE CLAIM (including declaratory judgment actions)
- 506 PIP COVERAGE
- 510 UM or UIM CLAIM (coverage issues only)
- 511 ACTION ON NEGOTIABLE INSTRUMENT
- 512 LEMON LAW
- 801 SUMMARY ACTION
- 802 OPEN PUBLIC RECORDS ACT (summary action)
- 999 OTHER (briefly describe nature of action)

Track II - 300 days' discovery

- 305 CONSTRUCTION
- 509 EMPLOYMENT (other than CEPA or LAD)
- 599 CONTRACT/COMMERCIAL TRANSACTION
- 603N AUTO NEGLIGENCE – PERSONAL INJURY (non-verbal threshold)
- 603Y AUTO NEGLIGENCE – PERSONAL INJURY (verbal threshold)
- 605 PERSONAL INJURY
- 610 AUTO NEGLIGENCE – PROPERTY DAMAGE
- 621 UM or UIM CLAIM (includes bodily injury)
- 699 TORT – OTHER

Track III - 450 days' discovery

- 005 CIVIL RIGHTS
- 301 CONDEMNATION
- 602 ASSAULT AND BATTERY
- 604 MEDICAL MALPRACTICE
- 606 PRODUCT LIABILITY
- 607 PROFESSIONAL MALPRACTICE
- 608 TOXIC TORT
- 609 DEFAMATION
- 616 WHISTLEBLOWER / CONSCIENTIOUS EMPLOYEE PROTECTION ACT (CEPA) CASES
- 617 INVERSE CONDEMNATION
- 618 LAW AGAINST DISCRIMINATION (LAD) CASES

Track IV - Active Case Management by Individual Judge / 450 days' discovery

- 156 ENVIRONMENTAL/ENVIRONMENTAL COVERAGE LITIGATION
- 303 MT. LAUREL
- 508 COMPLEX COMMERCIAL
- 513 COMPLEX CONSTRUCTION
- 514 INSURANCE FRAUD
- 620 FALSE CLAIMS ACT
- 701 ACTIONS IN LIEU OF PREROGATIVE WRITS

Multicounty Litigation (Track IV)

- | | |
|---|---|
| 271 ACCUTANE/ISOTRETINOIN | 296 STRYKER REJUVENATE/ABG II MODULAR HIP STEM COMPONENTS |
| 274 RISPERDAL/SEROQUEL/ZYPREXA | 297 MIRENA CONTRACEPTIVE DEVICE |
| 281 BRISTOL-MYERS SQUIBB ENVIRONMENTAL | 299 OLMESARTAN MEDOXOMIL MEDICATIONS/BENICAR |
| 282 FOSAMAX | 300 TALC-BASED BODY POWDERS |
| 285 STRYKER TRIDENT HIP IMPLANTS | 601 ASBESTOS |
| 286 LEVAQUIN | 623 PROPECIA |
| 287 YAZ/YASMIN/OCELLA | 624 STRYKER LFIT CoCr V40 FEMORAL HEADS |
| 289 REGLAN | 625 FIREFIGHTER HEARING LOSS LITIGATION |
| 291 PELVIC MESH/GYNECARE | 626 ABILIFY |
| 292 PELVIC MESH/BARD | 627 PHYSIOMESH FLEXIBLE COMPOSITE MESH |
| 293 DEPUY ASR HIP IMPLANT LITIGATION | 628 TAXOTERE/DOCETAXEL |
| 295 ALLODERM REGENERATIVE TISSUE MATRIX | 629 ZOSTAVAX |

If you believe this case requires a track other than that provided above, please indicate the reason on Side 1, in the space under "Case Characteristics."

Please check off each applicable category ☐ Putative Class Action ☐ Title 59

Civil Case Information Statement

Case Details: ESSEX | Civil Part Docket# L-002291-19

Case Caption: SCALERA LOUISE VS DSW DESIGNER
SHOE WA REHOUSE

Case Initiation Date: 03/26/2019

Attorney Name: JAMES C MESCALL

Firm Name: MESCALL & ACOSTA PC

Address: 80 MAIN ST, STE 360

WEST ORANGE NJ 07052

Phone:

Name of Party: PLAINTIFF : Scalera, Louise, E

Name of Defendant's Primary Insurance Company

(if known): Unknown

Case Type: PERSONAL INJURY

Document Type: Complaint with Jury Demand

Jury Demand: YES - 12 JURORS

Hurricane Sandy related? NO

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same transaction or occurrence)? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule* 1:38-7(b)

03/26/2019

Dated

/s/ JAMES C MESCALL

Signed